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Attorneys for Plaintiffs LES JANKEY and DISABILITY RIGHTS  
 ENFORCEMENT, EDUCATION, SERVICES:  
 HELPING YOU HELP OTHERS

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

LES JANKEY, an individual; and )  
 DISABILITY RIGHTS, ENFORCEMENT, )  
 EDUCATION, SERVICES:HELPING YOU )  
 HELP OTHERS, a California public benefit )  
 corporation, )

Plaintiffs, )

v. )

GEARY PARKWAY MOTEL; HENRY )  
 KAO-CHUN YANG TRUSTEE of the )  
 CHUNG LANG YANG IRREVOCABLE )  
 TRUST; BALWANTSINH D. THAKOT, and )  
 KIRANSHINH B. THAKOR, individuals dba )  
 GEARY PARKWAY MOTEL, )

Defendants. )  
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**CASE NO. C 08-02466 PJH**

**STIPULATION OF DISMISSAL AND  
~~PROPOSED~~ ORDER THEREON**

The parties, by and through their respective counsel, stipulate to dismissal of this action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(1). Outside of the terms of the Settlement Agreement and General Release (“Agreement”) herein, each party is to bear its own costs and attorneys’ fees. The parties further consent to and request that the Court retain jurisdiction over enforcement of the Agreement. *See Kokonen v. Guardian Life Ins. Co.*, 511 U.S. 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement agreements).

STIPULATION OF DISMISSAL AND [PROPOSED] ORDER THEREON

**CASE NO. C 08-02466 PJH**

Therefore, IT IS HEREBY STIPULATED by and between parties to this action through their designated counsel that the above-captioned action be and hereby is dismissed with prejudice pursuant to Federal Rules of Civil Procedure section 41(a)(1).

This stipulation may be executed in counterparts, all of which together shall constitute one original document.

Dated: May 17, 2011

THOMAS E. FRANKOVICH  
A PROFESSIONAL LAW CORPORATION

By: /S/ Thomas E. Frankovich  
Thomas E. Frankovich  
Attorney for Plaintiffs LES JANKEY and  
DISABILITY RIGHTS ENFORCEMENT,  
EDUCATION, SERVICES: HELPING YOU HELP  
OTHERS

Dated: May 17, 2011

Michael T. Heath  
Law Office of Michael Heath

By: /S/ Michael T. Heath  
Michael T. Heath  
Attorneys for HENRY KAO-CHUN YANG  
TRUSTEE of the CHUNG LANG YANG  
IRREVOCABLE TRUST; BALWANTSINH D.  
THAKOT, and KIRANSHINH B. THAKOR

**ORDER**

IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to Fed.R.Civ.P.41(a)(1). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing the parties' Settlement Agreement and General Release should such enforcement be necessary.

Dated: May 23, 2011

Honorable Judge  
UNITED STATES



STIPULATION OF DISMISSAL AND [PROPOSED] ORDER THEREON

CASE NO. C 08-02466 PJH